

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Cong. Casa Grande,

Plaintiff,

Case No. 1:24-cv-7752-VMS

v.

Joseph Lefkowitz and JNL Arizona Properties LLC,

Defendants.
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RULE 26(a) INITIAL DISCLOSURES BY DEFENDANTS

Defendants Joseph Lefkowitz and JNL Arizona Properties LLC through their undersigned counsel, make the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

1. Pursuant to Rule 26(a)(1)(A)(i), the names and contact information of persons likely to have discoverable information, and the subject matter thereof:

In addition to the parties themselves and their principals, the following persons have various degrees of knowledge concerning the solicitation of donations, the construction of the Mikvah and the subsequent restrictions placed on the use of the Mikvah by the Plaintiff. Contact information for these potential witnesses can be addressed in the first instance to the attention of the undersigned.

- a. Mr. Shmiel Yoel Felbrand
- b. Mr. Menachem Pachtman
- c. Rabbi Bension Goldman
- d. Mr. Avrum H. Breuer
- e. Mr. Hillel Lichtenstein
- f. Mr. Yochenen Lefkowitz
- g. Mr. Shia Moshe Leiberman
- h. Mr. Yeshia Steren
- i. Mr. Hershel Shreiber
- j. Mr. Eluzer Danziger
- k. Mr. Shemuall Brull
- l. Mr. Yoel Weinberger
- m. Mr. Moshe Markowits
- n. Mr. Eidlis
- o. Rabbi Yechial Steinments
- p. Rabbi Shapir Roizman

- q. Rabbi Yoel Yisroel Polatcheck
- r. Rabbi Yitschok Trigger
- s. Mr. Eli Itkowitz
- t. Mr. Bleiwer
- u. Mr. David Ehrman
- v. Mr. Anchi Perl
- w. Mr. Pinchas Ostreicher
- x. Mr. Avrum Silberstein
- y. Mr. Reuven Yosef Lefkowitz
- z. Mr. Nachman Lefkowitz
- aa. Mr. Joshua Lieberman
- bb. Mr. Hillel Lichtenstein
- cc. Mr. Shaye Shlezinger
- dd. Mr. Moshe Braunstein
- ee. Mr. Ben Tzien Gotheil
- ff. Mr. Amrom Herzog
- gg. Mr. Mordche Yoel Gross
- hh. Mr. Moshe Kraus

2. Pursuant to Rule 26(a)(1)(A)(ii), a copy—or a description by category and location—of all documents and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses:

The following general categories of documents are in the possession, custody or control of the Defendants:

- a. Bank records relating to the subject account
- b. Donation and solicitation literature for the Mikvah
- c. Beis Din papers

3. Pursuant to Rule 26(a)(1)(A)(iii), a computation of each category of damages claimed by the disclosing party:

The Counterclaim seeks a Declaratory Judgment, rather than monetary damages.

4. Pursuant to Rule 26(a)(1)(A)(iv), any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Not Applicable.

5. The foregoing disclosures are made without the benefit of completing discovery, and Defendants reserve the right to supplement the same as discovery progresses. The designations of witnesses and subjects on which witnesses may have discoverable information are not all-inclusive, as witnesses may have knowledge of additional subjects and additional witnesses may later be identified. By making these disclosures, Defendants

do not intend to waive, and hereby expressly reserve, any and all rights and objections they may assert in the future, whether in response to any discovery request propounded by Plaintiff or otherwise.

Dated: New York, New York
April 16, 2025

GOLDBERG WEPRIN FINKEL
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New York, NY 10017

By: /s/ Kevin J. Nash